

EXHIBIT B

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, *et al.*
f/k/a General Motors Corp., *et al.*,
Debtors.

Chapter 11

Case No.: 09-50026 (MG)

(Jointly Administered)

**ORDER GRANTING MOTION BY CERTAIN IGNITION SWITCH PRE-CLOSING
ACCIDENT PLAINTIFFS FOR AUTHORITY TO FILE LATE PROOFS OF CLAIM
FOR PERSONAL INJURIES AND WRONGFUL DEATHS IN CONNECTION WITH
SETTLEMENT WITH THE MOTORS LIQUIDATION COMPANY GUC TRUST**

Upon the motion (the “**Motion**”)¹ of the Ignition Switch Pre-Closing Accident Plaintiffs (the “**Movants**”) identified in the Proofs of Claim attached to the Motion, seeking an order granting authority to file the Proofs of Claim and deeming those claims to be timely as part of and in connection with the GUC Trust’s Settlement Motion and Estimation Motion; and due and proper notice of the Motion having been provided and it appearing that no other or further notice need be given; and the Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore; it is hereby

ORDERED that

1. The Motion is GRANTED as set forth herein.
2. The Movants are granted leave to file their Proofs of Claim against the Debtors.
3. The Movants’ Proofs of Claim shall be deemed timely for purposes of and in connection with the GUC Trust’s Settlement Motion and Estimation Motion.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. This Court shall retain jurisdiction with respect to the interpretation,
implementation and enforcement of this Order.

Dated: _____, 2018
New York, New York

Honorable Martin Glenn
United States Bankruptcy Judge